

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH MARK WILLIAMS, JR. and  
SHERRI LORRAINE SMITH,

Defendants.

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**INDICTMENT**

The Grand Jury charges:

**COUNT 1**

(Conspiracy to Sexually Exploit a Child)

Between in or about February 2017 and in or about May 2017, in Van Buren County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**JOSEPH MARK WILLIAMS, JR. and  
SHERRI LORRAINE SMITH,**

did willfully and knowingly conspire, confederate, and agree to commit sexual exploitation of a child, which is a violation of Title 18, United States Code, Section 2251(a), by agreeing to use a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and transmitting the visual depiction using any means or facility of interstate commerce and in or affecting interstate commerce.

Specifically, the defendants agreed to use A.S., a three-year-old female, to engage in sex acts and lasciviously display her pubic area, for the purpose of taking pictures of the conduct, and one or more pictures of such conduct was transmitted via the internet to Ohio.

18 U.S.C. § 2251(a) and (e)

**COUNT 2**  
(Sexual Exploitation of a Child)

Between in or about February 2017 and in or about May 2017, in Van Buren County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**JOSEPH MARK WILLIAMS, JR. and  
SHERRI LORRAINE SMITH,**

did use and aid and abet using a minor to engage in sexually explicit conduct for the purposes of producing a visual depiction of that conduct and the depiction was actually transmitted using any means or facility of interstate commerce and in or affecting interstate commerce.

Specifically, the defendants used and aided and abetted the use of A.S., a three-year-old female, to engage in sex acts and lasciviously display her pubic area, for the purpose of taking pictures of the conduct, and one or more of the pictures was actually transmitted via the internet to Ohio.

18 U.S.C. § 2251(a) and (e)  
18 U.S.C. § 2

**COUNT 3**  
(Sexual Exploitation of a Child)

Between in or about February 2017 and in or about May 2017, in Van Buren County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**JOSEPH MARK WILLIAMS, JR. and  
SHERRI LORRAINE SMITH,**

did use and aid and abet using a minor to engage in sexually explicit conduct for the purposes of producing a visual depiction of that conduct and the depiction was actually transmitted using any means or facility of interstate commerce and in or affecting interstate commerce.

Specifically, the defendants used and aided and abetted the use of C.J., an eleven-year-old female, to engage in sex acts, for the purpose of taking pictures of the conduct, and one or more of the pictures was actually transmitted via the internet to Ohio.

18 U.S.C. § 2251(a) and (e)  
18 U.S.C. § 2

**COUNT 4**  
(Sexual Exploitation of a Child)

Between in or about July 2015 and in or about January 2017, in Van Buren County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

**JOSEPH MARK WILLIAMS, JR.,**

did use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purposes of producing a visual depiction of that conduct and the depiction was produced using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer.

Specifically, the defendant used, persuaded, induced, and enticed B.L., a thirteen to fourteen-year-old female, to engage in sex acts for the purposes of taking pictures of the acts, and one or more of the pictures was created and stored with materials that had been shipped and transported in interstate commerce, including but not limited to, a cellular telephone and an HP laptop, manufactured outside of the State of Michigan.

18 U.S.C. § 2251(a) and (e)

**COUNT 5**  
(Distribution of Child Pornography)

Between in or about February 2017 and in or about May 2017, in Van Buren County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

**JOSEPH MARK WILLIAMS, JR.,**

knowingly distributed child pornography that was shipped or transported using any means or facility of interstate commerce, including by computer.

Specifically, the defendant distributed images of children engaged in sexually explicit conduct, including, but not limited to, the images alleged in Counts 2 and 3 to a person in Ohio via the internet.

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)  
18 U.S.C. § 2256(8)(A)

**FORFEITURE ALLEGATION**  
(Conspiracy; Sexual Exploitation of a Child;  
Distribution of Child Pornography)

The allegations contained in Counts 1 through 5 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation of 18 U.S.C. §§ 2251 or 2252A,

**JOSEPH MARK WILLIAMS, JR. and  
SHERRI LORRAINE SMITH**

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. §§ 2251 or 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses and any property traceable to such property. The property to be forfeited, as to all counts, includes, but is not limited to, a Hewlett-Packard laptop, serial number CND62061W9.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253(a), (b)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)  
18 U.S.C. § 2251  
18 U.S.C. § 2252A  
18 U.S.C. § 2256(8)(A)

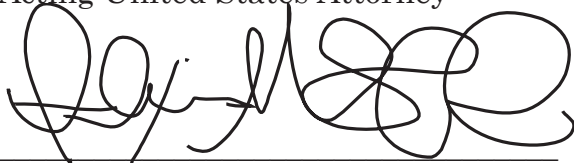
A TRUE BILL



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GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE  
Acting United States Attorney



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ALEXIS M. SANFORD  
Assistant United States Attorney